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Counsel for Debtor and Debtor-in-Possession  
*Vahan M. Dinihanian, Jr.*

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re  
15005 NW CORNELL LLC, and  
VAHAN M. DINIHANIAN, JR.  
Debtors.<sup>1</sup>

Bankruptcy Case Nos.:  
19-31883-dwh11 (Lead Case)  
19-31886-dwh11  
Jointly Administered Under  
Case No. 19-31883-dwh11

**DECLARATION OF NO OBJECTION TO  
DEBTORS' MOTIONS TO EXTEND TIME  
TO FILE MONTHLY OPERATING  
REPORTS**

I, Douglas R. Pahl, declare as follows:

I am an attorney at Perkins Coie LLP and represent Debtor 15005 NW Cornell LLC (“**Cornell**”).

I make this declaration based on personal knowledge and am competent to testify to the matters herein.

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871).

1           1.       On July 22, 2019, Debtor Vahan Dinihanian, Jr. (“**Dinihanian**”) filed a Motion to Extend  
2 Time to File Monthly Operating Report (Dkt. 40) in case number 19-31886-dwh11 for their June report.

3           2.       On July 22, 2019, Cornell filed a Motion to Extend Time to File Monthly Operating  
4 Report (Dkt. 58) in case number 19-31883-dwh11 for its June report.

5           3.       On July 24, 2019, Dinihanian filed a Second Motion to Extend Time to File Monthly  
6 Operating Report (Dkt. 61) in case number 19-31883-dwh11 for their June report.

7           4.       On July 24, 2019, Cornell filed a Second Motion to Extend Time to File Monthly  
8 Operating Report (Dkt. 62) in case number 19-31883-dwh11 for its June report.

9           5.       On July 31, 2019, I conferred with Stephen P. Arnot, Assistant United States Trustee for  
10 Region 18, on the above-referenced motions.

11          6.       Mr. Arnot indicated the United States Trustee had no objections to the above-referenced  
12 motions.

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15           *I hereby declare that the above statement is true to the best of my knowledge and belief, and that*  
16 *I understand it is made for use as evidence in court and is subject to penalty for perjury.*

17       DATED: July 31, 2019

/s/ Douglas R. Pahl

Douglas R. Pahl

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on July 31, 2019, they caused the foregoing document to  
3 be served via U.S. Mail to the parties listed on the respective attached service list and further caused  
4 each of the following documents to be served on all CM/ECF participants listed on the respective  
5 attached service list via the CM/ECF system.  
6

7 Dated: July 31, 2019

**PERKINS COIE LLP**

8 By: /s/ Douglas R. Pahl

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